

1 Counsel listed on the following page.
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT
12 SAN FRANCISCO DIVISION

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14 PETER WRIGHT and MICHELLE
15 TRAME, individually, on behalf of all
others similarly situated, and on behalf of
the general public,

16 Plaintiffs,

17 vs.

18 ADVENTURES ROLLING CROSS
19 COUNTRY, INC., dba ADVENTURES
CROSS COUNTRY (ARCC), a California
20 Corporation, SCOTT VON ESCHEN, and
DOES 1 through 50 inclusive,

21 Defendants.

22 Case No. 3:12-cv-00982-EMC

23 **JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE;
[PROPOSED ORDER]** Modified

24 **Judge:** Edward M. Chen
Ctrm: 5, 17th Floor

25 **Case Management Conference:**
November 9, 2012, 9:00 a.m.

26 **AND RELATED COUNTER ACTION**

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17 *dba ADVENTURES CROSS COUNTRY (ARCC) and*
18 *Defendant SCOTT VON ESCHEN*

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37 *Attorneys for Plaintiffs and Counter-Defendants*

1 TO THE COURT:

2 Plaintiffs PETER WRIGHT and MICHELLE TRAME (“Plaintiffs”) and Defendants
3 ADVENTURES ROLLING CROSS COUNTRY, INC., SCOTT VON ESCHEN and Cross-
4 Claimant SCOTT VON ESCHEN (“Defendants”), by and through their respective counsel of
5 record, herein agree and stipulate as follows:

6 **RECITALS**

7 1. The current counsel of record for Defendants filed a Notice of Appearance on
8 October 4, 2012, having recently substituted into this matter to represent Defendants.

9 2. The parties now respectfully request that the Case Management Conference
10 currently set for November 9, 2012 be vacated and re-scheduled in accordance with the court’s
11 calendar one week later, to November 16, 2012. There is good cause for this brief continuance
12 because Defendants’ counsel of record, Reed E. Schaper, who recently substituted in as counsel,
13 has a previously-scheduled appearance in Southern California on November 9, 2012.

14 **STIPULATION**

15 NOW, THEREFORE, Plaintiffs and Defendants hereby agree and stipulate as follows,
16 subject to Court approval, that the Case Management Conference set for November 9, 2012 be
17 vacated and continued to November 16, 2012 at 9:00 a.m., with a Joint Case Management
18 Statement filed one week prior to the re-scheduled conference.

19 IT IS SO STIPULATED:

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1 Dated: October 17, 2012

HIRSCHFELD KRAEMER LLP

3 By: /s/ Kristin L. Oliveira

4 Reed E. Schaper
Kristin L. Oliveira

5 Attorneys for Defendants
ADVENTURES ROLLING CROSS
COUNTRY, INC., dba ADVENTURES
6 CROSS COUNTRY (ARCC) and SCOTT
VON ESCHEN

7 Dated: October 16, 2012

BRYAN SCHWARTZ LAW
8 RUDY EXELROD ZIEFF & LOWE, LLP

10 By: /s/ Bryan J. Schwartz

11 Bryan J. Schwartz
Attorneys for Plaintiffs
12 PETER WRIGHT and MICHELLE TRAME

14 [PROPOSED] ORDER

16 Pursuant to the parties' Joint Stipulation, it is so ordered that the Case Management
17 Conference is re-scheduled from November 9, 2012 to November 16, 2012 at 9:00 a.m. A Joint
18 Case Management Conference statement shall be filed by November 9, 2012.

20 Dated: October 22, 2012

